

EXHIBIT E

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

CATHX RESEARCH LTD.,

Plaintiff,

v.

2G ROBOTICS INC. a/k/a VOYIS
IMAGING, INC.,

Defendant.

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Case No. 5:21-cv-00077-RWS

**DEFENDANT VOYIS IMAGING, INC.’S
REVISED ELECTION OF ASSERTED PRIOR ART**

Pursuant to the Court’s Order (Dkt. 134) entering the Model Order Focusing Patent Claims and Prior Art to Reduce Costs (General Order No. 13-20) in this matter and the Sixth Amended Docket Control Order (Dkt. 167), and in view of the Court’s Amended Claim Construction Order (Dkt. 165), Voyis Imaging, Inc. (“Voyis”) hereby identifies the following prior art combinations with respect to the asserted claims of the patents-in-suit. Voyis also incorporates by reference its initial, supplemental, second, third, and fourth supplemental invalidity contentions, and the expert report of Dr. Matthew Johnson-Roberson. The specific elected combinations of prior art references as to each of the patents-in-suit is set forth below.

U.S. Patent No. 10,116,841 Elected Prior Art Combinations

1. *Maki-1*¹ in view of *Madden*² and *Hudritsch*³
2. *Maki-1* in view of *Madden*, *Hudritsch* and *MacDonald*⁴
3. *Maki-2*⁵ in view of *Madden* and *Hudritsch*
4. *Maki-2* in view of *Madden*, *Hudritsch* and *MacDonald*
5. *LPP Offer For Sale*⁶ in view of *Madden* and *Hudritsch*
6. *LPP Offer For Sale* in view of *Madden*, *Hudritsch* and *MacDonald*

U.S. Patent No. 10,116,842 Elected Prior Art Combinations

1. *Gillham*⁷ in view of *Madden* and *Hudritsch*
2. *Gillham* in view of *Madden*, *Hudritsch* and *MacDonald*
3. *Kaltenbacher*⁸ in view of *Madden* and *Hudritsch*
4. *Kaltenbacher* in view of *Madden*, *Hudritsch* and *MacDonald*
5. *LPP Offer For Sale* in view of *Madden*, *Hudritsch* and *MacDonald*
6. *LPP Offer For Sale* in view of *Madden*, *Hudritsch* and *Gillham*

¹ Development of the AUV Tri-TON for Imaging Rough Seafloor (“Maki-1”)

² US 2011/0228075 (“Madden”)

³ US 2012/0069172 (“Hudritsch”)

⁴ Deep-Ocean Use of the SM2000 Laser Line Scanner on Submarine NR-1 Demonstrates System Potential for Industry and Basic Science (“MacDonald”)

⁵ Volumetric Mapping of Tubeworm Colonies in Kagoshima Bay through Autonomous Robotic Surveys (“Maki-2”)

⁶ ULS-500 integration with the Hugin AUV (“LPP Offer For Sale”)

⁷ US 2012/0062963 (“Gillham”)

⁸ US 7,417,666 (“Kaltenbacher”)

Dated: June 2, 2023

Respectfully submitted,

By: **BENESCH, FRIEDLANDER, COPLAN
& ARONOFF LLP**

/s/ Mircea Tipescu

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CERTIFICATE OF SERVICE

I, Mircea Tipescu, an attorney of record in this matter, hereby certify that on June 2, 2023, I emailed the following to all counsel of record:

**DEFENDANT VOYIS IMAGING, INC.'S
REVISED ELECTION OF ASSERTED PRIOR ART**

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